

# **Exhibit A**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ALABAMA  
SOUTHERN DIVISION**

LARA W. SWINDLE,

Plaintiff,

v.

CIVIL ACTION NO.:

JEFFERSON COUNTY COMMISSION;  
JEFFERSON COUNTY, ALABAMA;  
JEFFERSON COUNTY PERSONNEL  
BOARD; MIKE HALE, IN HIS  
OFFICIAL CAPACITY;  
RANDY STONE, IN HIS INDIVIDUAL  
CAPACITY; AND DAVID NEWTON,  
IN HIS INDIVIDUAL CAPACITY,

Defendants.

**COMPLAINT**

**I. INTRODUCTION**

1. This is an action for legal and equitable relief to redress unlawful sexual harassment, retaliation and discrimination on the basis of sex against the plaintiff. The suit is brought to secure the protection of and to redress the deprivation of rights secured by Title VII of the Civil Rights Act of 1964, 42 U.S.C. §§ 2000e et seq., as amended by the Civil Rights Act of 1991, 42 U.S.C. § 1981a; 42 U.S.C. § 1983 (hereinafter "Title VII"); Equal Protection Clause of the Fourteenth Amendment, which provides for relief against discrimination, harassment and retaliation in employment on the basis of sex. The Plaintiff seeks compensatory and punitive damages, and requests a jury trial pursuant to 42 U.S.C. § 1981a.

**II. JURISDICTION AND VENUE**

2. Jurisdiction of this Court is invoked pursuant to 28 U.S.C. §§ 1331, 1343(a)(3) and

1343(a)(4), and 42 U.S.C. § 2000e-5.

3. The unlawful employment practices alleged hereinbelow were committed by the Defendant within Jefferson County, Alabama. Venue is proper in this Court pursuant to 28 U.S.C. § 1391(b) and 42 U.S.C. § 2000e-5(g).

### **III. ADMINISTRATIVE PREREQUISITES**

4. Plaintiff has fulfilled all conditions precedent to the institution of this action including those statutory requirements under Title VII. Plaintiff timely filed her charge of discrimination within 180 days of occurrence of the last discriminatory act. Plaintiff also timely files this Complaint within ninety (90) days of the receipt of a Notice of Right To Sue issued by the Equal Employment Opportunity Commission, a copy of which is submitted herewith.

### **IV. PARTIES**

5. Plaintiff, Lara Swindle, is a female citizen of the United States over the age of nineteen (19) and is a resident of the State of Alabama.

6. Defendants Jefferson County Personnel Board, Jefferson County, Mike Hale in his official capacity as Sheriff of Jefferson County were the plaintiff's employer and/or joint employer. These defendants employ more than fifteen (15) employees, and, therefore, are "employers" for Title VII purposes.

7. Defendant Mike Hale is the current Sheriff of Jefferson County, and is a state actor for purposes of 42 U.S.C. § 1983. Defendant Hale is sued in his official capacity as Sheriff of Jefferson County.

8. Defendant David Newton is a deputy sheriff in Jefferson County and is sued in his individual capacity. Newton is a state actor. Defendant Newton is a resident of the State of Alabama.

9. Defendant Randy Stone is a deputy sheriff and is sued in his individual capacity. Stone is a state actor. Defendant Stone is a resident of the State of Alabama.

V. STATEMENT OF FACTS AND CLAIMS

10. The plaintiff realleges and incorporates by reference paragraphs 1-9 above with the same force and effect as if fully set out in specific detail hereinbelow.

11. Plaintiff began her employment as a Laborer III with the Jefferson County Sheriff's Department on May 22, 2006. Jefferson County paid her salary. As a Laborer III, Plaintiff always performed her job duties in a capable manner.

12. Since Plaintiff began her employment with Jefferson County Sheriff's Department, up to and including December 2007, she was sexually harassed by two deputies, Randy Stone and David Newton. Deputy David Newton was her supervisor at the time.

14. Shortly after starting her employment, Plaintiff asked for time off from work. Deputy David Newton, her supervisor, told Plaintiff, "I'll take you in my office and spank your little naked ass."

15. In the Summer of 2006, Plaintiff, Deputy Newton and John White were at the scene of a wreck involving a biscuit truck and a coal truck on Highway 269. After being outside at the scene for a while in the heat, they all got inside the truck to cool off. White, who was in the front seat, had leaned back with his eyes closed and Deputy Newton motioned for Plaintiff, who was in the back seat, to unbutton her top. He turned around to her while White's eyes were closed, and gestured to her with his shirt as to unbutton her shirt. He mouthed to her for her to unbutton her shirt and let him see her breasts. John White did not see this as he was sleeping. Plaintiff just sat there in shock.

16. On several occasions when Plaintiff would ask Deputy Newton for time off from work, he would tell her they would discuss that later. Newton would say, "I'm just going to have to take you in my office and spank that naked ass." This occurred in June 2006 and September 2006.

17. During the time period that Plaintiff and Deputy Newton were riding to and from work together, one day while Deputy Newton was driving Plaintiff home from work, he reached over and grabbed Plaintiff's breast outside of her clothing. They were both wearing seat-belts. This occurred between June and August 2006. Deputy Newton was a very intimidating man and Plaintiff was scared to say anything.

18. Plaintiff had little to no contact with any supervisory employees above Deputy Newton.

19. From October 2006 to October 2007, on numerous occasions during the course of Plaintiff's employment, Deputy Newton would lean up against Plaintiff's backside where his genital area would touch her backside.

20. Plaintiff would be inside of Deputy Newton's office and he would intentionally graze a breast with his hand. Newton would intentionally grab Plaintiff's breasts. Sometimes he would make it appear to be accidental and sometimes he would just blatantly grab her breast.

21. Any time Plaintiff or other employees had a problem with Deputy Newton and expressed wanting to speak to a sergeant about it, they were told he would speak with them first or no you cannot see the sergeant. This made Plaintiff fear discussing it with a sergeant out as she would be disobeying direct orders. Plaintiff was very intimidated.

22. On several occasions, Deputy Stone would pull his car up at the Sylvan Springs substation and motion for Plaintiff to come over to his car. She walked to the passenger side and

leaned down and he said, "come on and unbutton one or two buttons for me" and "why don't you let me see those things?" Plaintiff told him no. Stone would also do this inside the substation while she was sitting at her desk. Stone would touch his shirt trying to get her to unbutton her top. She would shake her head and tell him no. She informed Deputy Newton about Deputy Stone's behavior, and Newton responded by saying "he's just a pervert." This occurred after Deputy Newton had grabbed Plaintiff's breast.

23. In February 2008, Plaintiff and Deputy Stone were on the roadblock checking driver's licenses. She was sitting in the driver's seat with the window rolled down. Deputy Newton was standing in the road. Deputy Stone walked over to the window where she was sitting with her cell phone between her legs. Stone reached in and said "give me that phone" and attempted to grab the phone between her legs. She put her right hand on the phone and shooed his arm away with the left hand, instructing him to leave her phone alone.

24. Also, some time in late Fall/early Winter 2007, at the Sylvan Springs substation, Deputy Stone had been touching Plaintiff's hair and then intentionally took her hand. Plaintiff placed it on his crotch while saying, "see what you made happen?", referring to his erect penis. Plaintiff told him to go take care of that on his own. After that incident, Plaintiff made it a point not to be alone with Deputy Stone. If she was about to be left alone in a room with him she would make sure she left.

25. On or about March 26, 2008, Plaintiff filed a sexual harassment complaint with her employer against Randy Stone and David Newton.

26. On March 26, 2008, Plaintiff met with Sgt. Saxton and Lt. Farley informing them of the problems she had been having with Deputy Stone and Deputy Newton. Lt. Farley told Plaintiff

that she would be put to work in the Bessemer office and that Deputy Newton would continue on with the rest of the crew as usual. Plaintiff discussed with Lt. Farley that this was unfair and she felt she was being punished for making complaints of sexual harassment. Plaintiff told Lt. Farley that it would cost her money to travel to and from work and Deputy David Newton was not having to move. Lt. Farley changed his mind and placed Plaintiff on Administrative Leave. She went home and received a telephone call that he had again changed his mind and that she was to report to her normal workplace, while Newton was placed on Administrative Leave.

27. On March 26, 2008, Deputy David Newton was placed on Paid Administrative Leave.

28. On March 27, 2008, Plaintiff was called to Internal Affairs to meet with Sgt. West. She was interviewed at length about her allegations of sexual harassment against David Newton and Randy Stone.

29. On April 1, 2008, Plaintiff's crew (the weight crew) was assigned to Deputy Arnold and they were asked to report to the Bessemer Office. While they were there, Plaintiff was told by Lt. Farley that Internal Affairs had turned the investigation over to Sgt. Bill Franklin to handle the case. Several people from the weight crew were interviewed by Sgt. Franklin, but Plaintiff was not interviewed by him that day.

30. After Plaintiff made the complaint against Newton and Stone, she continued to be sexually harassed and discriminated against by other employees of the Jefferson County Sheriff's Department. For example, during the time that Deputy Arnold was over the weight crew, he made the statement to Plaintiff in front of Sgt. Saxton, John White, and Allan McClinton, that he would have to pick them up at the Bessemer Office because he did not want to be alone in the car with Plaintiff because of what she said about Deputies Newton and Stone. Lt. Farley had told him not to

change where they met to be picked up. Plaintiff had been told that her allegations were confidential and she, herself, had made no mention of these allegations to Deputy Arnold. Plaintiff was extremely embarrassed and humiliated in front of her co-workers. Deputy Arnold again said that he would not pick Plaintiff up or be alone with her because she could say those same things about him. Sgt. Saxton told Deputy Arnold that that was uncalled for. Plaintiff had someone pick her up because she was so upset and humiliated that she could not work that day.

31. On April 7, 2008, Plaintiff was interviewed by Sgt. Bill Franklin.

32. On April 9, 2008, Deputy Randy Stone was placed on Paid Administrative Leave.

33. On May 5, 2008, Plaintiff was required to go to Internal Affairs and undergo a polygraph examination regarding her allegations of sexual harassment.

34. On May 9, 2008, the weight detail crew was told by the Bessemer Office that they would be receiving a new supervisor, Deputy Charlotte Ryan. If Deputy Ryan were off, Deputy Arnold would be the fill-in supervisor.

35. In May 2008, Plaintiff and the weight crew were under an interstate overpass working. Michael Winton was told to stand by Deputy Arnold and help him with paperwork and Plaintiff was to teach Doug Blanchard how to weigh. During this time a tractor trailer came through needing to be weighed. Deputy Arnold told Plaintiff to get out the scales. There were four (4) scales weight approximately 80 pounds each to be used. Michael Winton began towards Plaintiff to assist with this, and Deputy Arnold told him, "no, she will get them." Michael Winton again tried to assist Plaintiff in carrying the scales and was told no. Deputy Arnold told them that he was the supervisor and that they would do things his way and wanted to know which of them had called the Sergeant. Allan McClinton said he had called the sergeant. Plaintiff had also called the sergeant and she told



Deputy Arnold that she was calling him again now. Plaintiff told Deputy Arnold and Sgt. Saxton that she felt she was being retaliated against as a result of the sexual harassment complaint she had filed. She told him he was discriminating against her by making her handle the scales alone.

36. On June 6, 2008, Deputy Randy Stone was terminated. On June 9, 2008, Stone served his Notice of Appeal to the Personnel Board of Jefferson County, Alabama, admitting guilt, in part, to the charges against him and alleging that his termination was too severe a penalty.

37. In June 2008, Plaintiff heard rumors that Deputy Stone had been terminated. Plaintiff called Sgt. West and asked if Stone had been terminated, and he told her yes but would not tell her anything else. He said she would receive a letter when the sexual harassment investigation was completed, in approximately 7-10 days.

38. On July 8, 2009, Deputy David Newton was terminated from his employment with the Jefferson County Sheriff's Department. This decision was appealed by Defendant Newton on July 11, 2009.

39. Plaintiff was asked by co-workers what happened to David Newton, and then they would tell her, "I heard you filed sexual harassment charges on him." Plaintiff would ask where they got this information and they said they heard it from deputies. Plaintiff called Lt. Mark Farley and asked him how her co-workers knew about her sexual harassment charge, since it was supposed to be kept confidential. Plaintiff told Lt. Farley that this was very embarrassing and humiliating for her. He assured her that he would talk to the deputies and instruct them that they were not to mention this.

40. On August 22, 2008, Plaintiff received a letter from Chief Deputy Jim Atkinson confirming that her sexual harassment complaints against Deputy David Newton and Deputy Randy

Stone had been substantiated and that they were being terminated.

41. On August 24, 2008, Plaintiff filed a grievance with the Personnel Board of Jefferson County regarding why without an official complaint being filed or a proper investigation being performed, was she received a performance counseling.

42. On October 14, 2008, the Personnel Board of Jefferson County overturns Jefferson County Sheriff's Office decision to terminate Deputy Randy Stone. Plaintiff was subpoenaed to appear at the hearing regarding Deputy Stone, but received a letter from the Michael Kendrick, attorney for Sheriff Hale, releasing her from the subpoena.

43. On December 15, 2008, the Personnel Board of Jefferson County convened regarding the termination of Deputy David Newton.

**COUNT I: 42 U.S.C §1983 AND THE FOURTEENTH AMENDMENT OF THE U.S.  
CONSTITUTION AGAINST NEWTON AND STONE AND TITLE VII VIOLATIONS  
OF SEXUAL HARASSMENT AND SEX DISCRIMINATION**

44. The plaintiff realleges and incorporates by reference paragraphs 1-43 above with the same force and effect as if fully set out in specific detail hereinbelow.

45. After Plaintiff began her employment with Jefferson County Sheriff's Department, up to and including February 2008, she was subjected to sexual harassment, including physical touching, by Defendant Stone and Deputy David Newton, Plaintiff's supervisor.

46. On or about March 26, 2008, Plaintiff filed a sexual harassment complaint with her employer against Randy Stone and David Newton.

47. Following Plaintiff's complaint of sexual harassment against Defendant Stone and Deputy Newton, plaintiff was subjected to further discrimination based on her sex.

**COUNT II: TITLE VII VIOLATION OF RETALIATION**

48. The plaintiff realleges and incorporates by reference paragraphs 1-47 above with the same force and effect as if fully set out in specific detail hereinbelow.

49. After Plaintiff complained of sexual harassment, she was retaliated against by being told she would have to work at the Bessemer office. Specifically, on March 26, 2008, Plaintiff met with Sgt. Saxton and Lt. Farley informing them of the problems she had been having with Deputy Stone and Deputy Newton. Lt. Farley told Plaintiff that she would be put to work in the Bessemer office and that Deputy Newton would continue on with the rest of the crew as usual. Plaintiff discussed with Lt. Farley that this was unfair and she felt she was being punished for making complaints of sexual harassment. Plaintiff told Lt. Farley that it would cost her money to travel to and from work and Deputy David Newton was not having to move. Lt. Farley changed his mind and placed Plaintiff on Administrative Leave. She went home and received a telephone call that he had again changed his mind and that she was to report to her normal workplace, while Newton was placed on Administrative Leave.

50. In May 2008, Plaintiff was retaliated against by being made to do things that required more than one person by herself.

51. Plaintiff was retaliated against by having other employees being told of her sexual harassment complaint that was supposed to be confidential.

52. Plaintiff was retaliated against by being required to ride to a job in a patrol unit that had a cage, which Deputy Charlotte Ryan, her supervisor had instructed against.

53. Plaintiff was retaliated against by being required to perform job duties alone that required more than one person to perform.

54. On July 24, 2008, Plaintiff was retaliated against by being called in to Lt. David McAnally's office for a counseling for allegedly having her feet in her fiancée's lap while on duty. Lt. David McAnally called Plaintiff into the Bessemer Office and was told her that he was the new patrol Lieutenant. He told her that someone had complained that she was at the Sylvan Springs substation sitting on a couch with her feet in her fiancée's lap. Plaintiff asked when this was allegedly occurred. Lt. McAnally said he did not know, but he had to counsel her on this and make sure this type of behavior did not occur at work. She told him she was aware of that. He told her that he did not know whether or not this had happened, but to make sure it did not happen again. Plaintiff told Lt. McAnally that it had not happened and would not ever happen. She asked again who made these allegations and he said he did not know, but it was brought to him and he was trying to stop it. Lt. McAnally required Plaintiff to sign a form stating he had counseled her on her behavior and that she agreed not to let it happen again. Plaintiff told him that she could not sign something stating she had done this, because that would mean it was true, and it was not.

55. On August 20, 2008, Plaintiff was called into the Bessemer Office. She was called into a conference room where present were Lt. David McAnally, Lt. Mark Farley, Sgt. Mobley (Internal Affairs) and Captain Cleveland Moore. Plaintiff was told that she was being called in to complete the counseling session from July 24, 2008, with Lt. McAnally. Plaintiff explained to Captain Moore her reason for not signing the counseling form. He then asked if she was at work on July 14, 2008. She told him she was unsure because she had been off work some days in July, and that she would need to check her calendar. He told her that Deputy Ron Michaels had seen her with her feet in her fiancée's lap while sitting on the couch at the Sylvan Springs substation. She explained that she, at no time, had her feet in his lap while she was at work. Other employees present were

Michael Winton, Doug Blanchard, and possibly Allan McClinton. Plaintiff suggested that Captain Moore question the other witnesses who were present, as Michaels' statements were untrue. At the end of the counseling session, Plaintiff was not asked to sign anything.

56. On August 24, 2008, Plaintiff filed a grievance with the Personnel Board of Jefferson County regarding why without an official complaint being filed or a proper investigation being performed, was she received a performance counseling.

57. On September 9, 2008, Plaintiff was retaliated against by being required to undergo a polygraph examination to prove that her side of the story regarding Ron Michaels allegations of her having her feet in her fiance's lap was true.

58. The unlawful conduct of the defendants as described above was done with malice and/or reckless disregard of and/or deliberate indifference to the plaintiff's federally protected rights.

59. The defendants' conduct as described above caused the plaintiff emotional distress, mental anguish, loss of enjoyment of life, inconvenience, and humiliation.

60. The plaintiff has no plain, adequate, or complete remedy at law to redress the wrongs alleged herein and this suit for back-pay, injunctive relief, compensatory and punitive damages and a declaratory judgment is her only means of securing adequate relief. The plaintiff is now suffering and will continue to suffer irreparable injury from the defendants' unlawful conduct as set forth herein unless enjoined by this Court.

#### **COUNT IV: ASSAULT AND BATTERY**

61. The Plaintiff re-alleges and incorporates by reference paragraphs 1 - 60 above with the same force and effect as if fully set out in specific detail herein below.

62. This is a claim arising under the law of the State of Alabama to redress the assault

and battery against Plaintiff by Defendants Newton and Stone and Defendant Jefferson County Personnel Board, Defendant Mike Hale, in his official capacity, and Defendant Jefferson County Commission's ratification of that conduct.

63. Defendant Newton and Defendant Stone subjected Plaintiff to harmful, rude and unwanted touching by touching her breasts.

64. Such conduct proximately caused Plaintiff to suffer great emotional and physical distress for which she claims compensatory and punitive damages from the Defendants.

65. Defendant Jefferson County Personnel Board, Defendant Mike Hale, in his official capacity, and Defendant Jefferson County Commission condoned, authorized, and/or ratified Defendant Newton's and Defendant Stone's conduct because they knew or should have known of the assault and battery of the Plaintiff and failed to take any preventative and/or corrective actions to stop Defendant Newton's and Defendant Stone's unlawful conduct.

#### **COUNT V: INVASION OF PRIVACY**

66. Plaintiff re-alleges and incorporates by reference paragraphs 1 - 65 above with the same force and effect as if fully set out in specific detail herein below.

67. This is a claim arising under the law of the State of Alabama to redress violations by Defendant Newton and Defendant Stone of the Plaintiff's right to privacy and Defendant Jefferson County Personnel Board, Defendant Mike Hale, in his official capacity, and Defendant Jefferson County Commission's ratification of that conduct.

68. The conduct of Defendant Newton and Defendant Stone, as set out in detail above, was an invasion of Plaintiff's privacy and proximately caused Plaintiff to suffer great emotional distress for which she claims compensatory and punitive damages from the Defendants.

69. Defendant Jefferson County Sheriff's Personnel Board, Defendant Mike Hale, in his official capacity, and Defendant Jefferson County Commission condoned, authorized, and/or ratified Defendant Newton's and Defendant Stone's unlawful conduct in that they knew or should have known of the continuing tortuous invasion of privacy of the Plaintiff and failed to take any action to prevent and/or correct Defendant Newton's or Defendant Stone's conduct.

**COUNT VI: OUTRAGE**

70. Plaintiff re-alleges and incorporates by reference paragraphs 1 - 69 above with the same force and effect as if fully set out in specific detail hereinbelow.

71. This is a claim arising under the law of the State of Alabama to redress Defendant Newton's and Defendant Stone's outrageous conduct towards the Plaintiff and Defendant Jefferson County Personnel Board, Defendant Mike Hale, in his official capacity, and Defendant Jefferson County Commission's ratification of that conduct.

72. The conduct of Defendant Newton, Defendant Stone, and other agents, officers, and servants of Defendant Jefferson County Personnel Board, Defendant Mike Hale, in his official capacity, and Defendant Jefferson County Commission, as set out above, was extreme, outrageous and beyond the boundaries of decency in civilized society, and it proximately caused Plaintiff to suffer great emotional distress for which she claims compensatory and punitive damages from the Defendants.

73. Defendant Jefferson County Personnel Board, Defendant Mike Hale, in his official capacity, and Defendant Jefferson County Commission condoned, authorized, and/or ratified Defendant Newton's and Defendant Stone's conduct, because they knew or should have known of Defendant Newton's and Defendant Stone's outrageous conduct towards Plaintiff and failed to take

any action to prevent or stop Defendant Newton's or Defendant Stone's unlawful conduct.

**COUNT VII: NEGLIGENCE AND/OR WANTON SUPERVISION,  
TRAINING, AND RETENTION**

74. The Plaintiff re-alleges and incorporates by reference paragraphs 1 - 73 above with the same force and effect as if fully set out in specific detail herein below.

75. This is a claim arising under the law of the State of Alabama to redress Defendant Jefferson County Personnel Board, Defendant Mike Hale, in his official capacity, and Defendant Jefferson County Commission's negligent and/or wanton supervision, training, and retention of Defendant Newton and Defendant Stone and other agents, officers, and servants of Defendant, as set out above.

76. Defendant Jefferson Personnel Board, Defendant Mike Hale, in his official capacity, and Defendant Jefferson County Commission negligently, wantonly and/or inappropriately failed to adequately supervise, and train Defendant Newton and Defendant Stone.

77. Further, Defendant Jefferson County Personnel Board, Defendant Mike Hale, in his official capacity, and Defendant Jefferson County Commission negligently and/or wantonly retained Defendant Newton and Defendant Stone which proximately caused Defendant Newton's and Defendant Stone's unlawful sexual harassment, sex discrimination and retaliation of the Plaintiff.

78. Defendant Newton's and Defendant Stone's unlawful sexual harassment, sexual discrimination, and retaliation of the Plaintiff caused her great emotional distress for which she seeks compensatory and punitive damages against the Defendants.



**VII. PRAYER FOR RELIEF**

WHEREFORE, the Plaintiff respectfully prays that this Court assume jurisdiction of this action and after trial:

1. Issue a declaratory judgment that the employment policies, practices, procedures, conditions and customs of the Defendant Jefferson County Personnel Board, Defendant Mike Hale, in his official capacity, and Defendant Jefferson County Commission are violative of the rights of the plaintiff as secured by Title VII and the law of the State of Alabama.
2. Grant plaintiff a permanent injunction enjoining the Defendant Jefferson County Personnel Board, Defendant Mike Hale, in his official capacity, and Defendant Jefferson County Commission, their agents, successors, employees, attorneys and those acting in concert with the defendants and at the defendants' request from continuing to violate Title VII and the law of the State of Alabama.
3. Enter an Order requiring the Defendants to make the plaintiff whole by awarding her the position(s) she would occupy in the absence of sex harassment, sex discrimination, and retaliation and/or frontpay, backpay (plus interest), any corresponding benefits thereto, and compensatory, punitive, and/or nominal damages.
4. The plaintiff further prays for such other relief and benefits as the cause of justice may require, including, but not limited to, an award of costs, attorney's fees and expenses.

Respectfully submitted,



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Ann C. Robertson

OF COUNSEL:

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(205) 314-0500

**PLAINTIFFS DEMAND A TRIAL BY STRUCK JURY ON ALL ISSUES TRIABLE TO JURY.**

  

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OF COUNSEL

**Defendants' Addresses:**

Jefferson County Commission  
Jefferson County Courthouse  
716 Richard Arrington Jr. Blvd North  
Birmingham, AL 35203

Jefferson County, Alabama  
c/o Jefferson County Commission  
Jefferson County Courthouse  
716 Richard Arrington Jr. Blvd North  
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Mike Hale, Sheriff  
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Randy Stone

David Newton